

FILED

11/29/2021

CM

1:21-CR-00696

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LINDSEY BELL

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No. 21 CR 696

Violations: Title 18, United States

Code, Sections 922(g)(1),

924(c)(1)(A), and 2114(a)

COUNT ONE

JUDGE CHANG
MAGISTRATE JUDGE COLE

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about November 12, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

LINDSEY BELL,

defendant herein, robbed a person having lawful charge, control, and custody of any
money and other property of the United States, and, in effecting such robbery, put
that person's life in jeopardy by the use of a dangerous weapon, namely, a firearm;

In violation of Title 18, United States Code, Section 2114(a).

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about November 12, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

LINDSEY BELL,

defendant herein, did knowingly use, carry, and brandish a firearm, namely a loaded Glock Model 21 .45-caliber semiautomatic pistol bearing serial number BKWA019, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, robbery of property of a person having control of money of the United States, in violation of Title 18, United States Code, Section 2114(a), as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

On or about November 12, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

LINDSEY BELL,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Glock Model 21 .45-caliber semiautomatic pistol bearing serial number BKWA019, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g) and 924(c), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Glock Model 21 .45-caliber semiautomatic pistol bearing serial number BKWA019, and associated ammunition.

A TRUE BILL:

FOREPERSON

Signed by Scott M. Edenfield on behalf of the
UNITED STATES ATTORNEY